

PRIVACY POLICY

Last update on November 5th, 2022.

1. The meaning of terms

The User – is the person accessing the website of the Service provider

Service provider - CA Automations Ltd for computer engineering, Josipa Mohorića 54, 51000 Rijeka, Republic of Croatia, PIN: 47360287821

The terms used in these General Terms and Conditions and have gender meanings are used neutrally and apply equally to all genders.

2. Protection of User's personal data

At CA Automations Ltd ("Service provider", "Company", "we", "us" or "our"), we are committed to affirming the principles of legal, fair and transparent processing of personal data in accordance with Regulation (Eu) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the Protection of a person With Regard To The Processing Of Personal Data And On The Free Movement Of Such Data, And Repealing Directive 95/46/EC (General Data Protection Regulation) and the current laws of the Republic of Croatia governing the area of personal data protection.

We are dedicated to the protection of personal data of our employees, customers, users, business partners, or other persons with whom we are cooperating. We collect only necessary, basic data that is necessary for the fulfilment of our obligations, regularly inform about the usage of collected data, and give you the option of choosing the way your personal data will be used including the decision whether or not you want your name removed from lists used for marketing campaigns. All user data is safely stored and is available only to employees who need this data to perform their work. All employees of CA Automations Ltd, and business partners are responsible for respecting the principles of privacy protection.

You guarantee that the information you provide is accurate, complete and up-to-date. By accepting this Privacy Policy, you confirm that you agree with the use of your personal data for the above-mentioned purposes. All communication related to the order process and conclusion of the sales contract is carried out via e-mail and/or telephone number that you provide.

In the event of a dispute before the court, the court of actual jurisdiction is in Rijeka, Republic of Croatia, on whose territory the Company's headquarter is located.

3. Data collection

Personal data is any data relating to an individual whose identity is known or can be determined. An identifiable individual is a person who can be identified directly or indirectly, especially with the help of identifiers such as a name, personal identification number, location data and network identifier. They can be identified with the help of one or more factors inherent in the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

We collect information about you that allows us to ensure the smooth operation of our website and to provide you with the best possible experience on our website and during the time that the services are provided. Generally speaking, we distinguish between (a) personal data that you provide to us, (b) personal data that we collect automatically and (c) personal data that we receive from another source.

4. Personal data that you give us

For example, we collect data that you provide when you visit our website or when you order one of our services - in such cases, you fill in certain fields or click on a certain button and thereby possibly provide us with your personal data. When you provide us with service feedback or complain about a particular service, it is also possible (or likely) that we will collect some personal information from you.

We collect all this data when you give us your consent for such collection or for the reason that we need such data to fulfil our contractual obligation (for example when we have to respond to a specific complaint related to the service), and for the purposes of this Privacy Policy, we consider them Personal data that you give us.

5. Consent

Each user gives their Consent to the collection of their personal data and it is considered that the User has given consent to the collection of his personal data when he has agreed to this Privacy Policy and/or our General terms and

condition. The User can receive the form by which he will give special consent for the collection of personal data.

6. Personal data that we collect automatically

There is also Personal Data that we collect automatically. This is data that we record when you use our websites or when you use some of our services. Whenever you use our websites or, for example, when you read one of our e-mails, certain information (which is not necessarily personal data) is created and automatically collected.

We collect such data to pursue a legitimate interest, and for this Privacy Policy, we consider them to be Personal Data that we collect automatically.

7. Personal data that we receive from another source

It is possible that we receive a personal data about the User from another source. For example, we can receive information about the User via 'social networks', and we will use them exclusively to achieve some legitimate interest, and for the purposes of this Privacy Policy and our General Terms and conditions we consider them as Personal data that he receives from another source.

8. Data processing

We use the obtained user data for one or more of the following purposes:

- To personalize the user experience (collected information helps us better respond to the individual needs)
- To improve our website (we constantly strive to improve the offer of our website based on the feedback we receive from our visitors)
- To establish the primary channel of communication
- To send occasional emails (concerning occasional news, updates, information about services, etc.)

9. To whom do we share information about you?

Only when it is necessary, we will share your personal data with the following categories of recipients:

- Associates at CA Automations Ltd and related companies
- Third parties who have information about your finances, such as financial or credit institutions

- Public-legal bodies, when, acting in good faith, we have reason to believe that this is necessary to comply with a legal obligation
- Other service providers who provide a specific service on our behalf, or possibly third-party IT service providers with whom we have entered into appropriate contracts for the processing of personal data (or there are other appropriate mechanisms).

10. Other websites

Our website may contain links to other websites. This Privacy Policy applies only to websites managed by CA Automations Ltd, so when you click on a link that takes you to other websites, you should read their rules and privacy policies.

11. Data protection

To protect the personal data, we receive through the website, we use physical, technical, and organizational security measures. We are constantly upgrading and testing our security technology. We limit access to personal information to only those employees who need to know that information to provide benefits or services.

In addition, we educate our employees about the importance of data confidentiality and the preservation of privacy and the protection of your data.

Personal data that is exchanged between you and us through our website is transmitted using the most modern connections. All used IT systems are protected against unauthorized access to security systems, and employees are obliged to keep data confidential. However, CA Automations Ltd has no effect on the transmission of data over the Internet and therefore cannot exclude misuse of third-party access.

12. Individual rights

If you want to know whether we own and process your personal data, or if you want to access your personal data, you can contact us at info@caautomations.com.

You may also demand the following information: the purpose of data processing, categories of personal data under processing, who else outside of our company has received personal data from us, who is the source of the personal data (if not directly provided to us) and how long we will keep the data. You have the right to

correct the personal data we have if it is incorrect. You can also, with certain exceptions, request that we delete the data or stop processing it. You may ask us to stop using personal data for direct marketing purposes.

If it is technically feasible, we will, based on the request, send personal data to you or transfer them directly to another data controller.

If you submit a request to info@caautomations.com to send you your personal data, we will comply with that request within a reasonable period of 14 working days. If we cannot comply with the request within a reasonable time, we will inform you of the date when we will comply with the request. If for some reason we cannot fulfill that request, we will send an explanation of why we did not fulfill your request.

Based on the General Data Protection Regulation, you have the following rights:

1. The right to object

This right allows you to object to the processing of your personal data, in those cases where we process your personal data on one of the following legal bases:

- because the processing of personal data is in our legitimate interest
- to fulfill a contractual obligation
- for scientific, research, marketing, or statistical purposes

In these circumstances, the processing of your personal data based on legitimate interest will most often be applied. If we are unable to demonstrate that we have a convincing and legitimate basis for processing your personal data, which goes beyond your rights and interests, we will stop processing your personal data.

2. The right to withdraw consent

In cases where we have obtained your consent for certain actions, you are entitled to withdraw the given consent at any time and we will stop using your personal data for this purpose unless we believe that there is an alternative legal basis that would justify the further processing of your personal data for this purpose, in which case we will inform you about it.

3. The right of access

You can also request information about the purpose of the data processing, the categories of personal data being processed, who else outside of our company has received personal data from us, and what is the source of the personal data (if you have not provided it directly to us) and how long we will keep the data.

If it is technically feasible, we will send you personal data based on your request or transfer them directly to another data controller.

At any time, you are authorized to ask us for a copy of the information we have about you, as well as to ask us to modify, update or delete this information. We may ask you for additional information about your request. If we provide you with access to the data we hold about you, we will do so free of charge, unless the processing of the request is manifestly unfounded or excessive. In case you request additional copies of this data from us, a proportionate administrative fee may be charged. Your request may be denied in cases where this is legally permitted.

4. The right to deletion

In certain circumstances, you are authorized to request that we "delete" your personal data. For example, you have this right in the following cases:

- We no longer need your data for the purpose for which it was initially collected
- You have withdrawn the consent you gave us to process your personal data and there is no other legal basis for us to continue processing your personal data (in cases where the legal basis for processing personal data is Consent)
- Data was processed without a valid legal basis
- Deletion of data is necessary to comply with our legal obligations
- You have objected to the processing of personal data, and we are unable to prove the existence of a legitimate legal basis that exceeds your rights and interests, on the basis of which we would be authorized to continue processing your personal data

We are authorized to reject your request for data deletion only in a limited number of cases, and in such cases, we will explain the reasons for the rejection in detail.

5. Right to restrict processing

In certain circumstances, you have the right to request that we restrict the processing of your personal data, for example, if you object to the processing of your personal data based on our legitimate interest.

6. The right to rectification

You have the right to correct the personal data we hold if it is incorrect. You can also, with certain exceptions, request that we delete the data or stop processing it. You can ask us to stop using personal data for direct marketing purposes.

You have the right to request the correction of any inaccurate or incomplete information we have about you. In the event that we have shared your data with third parties, we will notify them of the correction, unless this is not possible or would cause disproportionate difficulties. You are also authorized to request information about third parties to whom we have provided incorrect or incomplete personal information. In the event that we consider that it is not reasonably possible to act on your request, we will inform you about this and we will explain the reasons for such a decision.

7. The right to transfer

If you wish, you are authorized to request the transfer of your personal data to another data controller. This right actually means that it is possible to request that your personal data be transferred to a third party. In order to enable you to do this, we will transfer your data to you in the usual, machine-readable form so that you can transfer your personal data to a third party.

13. Period of storage of your personal data

Following your rights as a data subject, we will store the data in accordance with the relevant regulations, whereby the storage periods may depend on the fulfillment of some of our obligations based on a certain regulation. In any case, when it is determined that we no longer need your data and that the legal deadlines for keeping such records and data have passed, we will delete your personal data.

14. How to contact us

If you wish to exercise one of the aforementioned rights or withdraw your consent for the processing of your personal data (in cases where consent is the legal basis for the processing of your personal data), please contact us. Please

note that we will keep a record of our communications so that we can resolve any disputes on time.

You can contact us at any time in the following way:

Headquarter address: CA Automations Ltd, Josipa Mohorića 54, 51000 Rijeka, Republic of Croatia

E-mail: info@caautomations.com

Phone: 00385 (0)99 679-9499

15. Notification of personal data breach

In the event of a personal data breach, we will notify those whose data is at risk and the competent supervisory authority by e-mail within 72 hours about the extent of the breach, the data covered, the possible impact on our services, and our planned measures to secure data and limit any adverse effects by individuals.

16. The right to complain to the competent authority

At any time, you can send a complaint to the supervisory authority regarding the collection and processing of personal data. In the Republic of Croatia, you can file a complaint to:

Agency for the Protection of Personal Data (AZOP)

Selska cesta 136, 10 000 Zagreb, Croatia

Tel. 00385 (0)1 4609-000, Fax. 00385 (0)1 4609-099

E-mail: azop@azop.hr, Web: www.azop.hr

17. Changes to our privacy policy

We reserve the right to change this Privacy Policy in accordance with changes in legal provisions, business policies of our company, or other circumstances that affect the area of data protection. In case of changes, we will inform you about it on the website and update the date of modification of the Privacy Policy.

We regularly review this Privacy Policy and, if necessary, supplement them with additional information because we care about your privacy.